

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF MISSOURI**

In re: ARTHUR EUGENE THOMPSON SR. &)
MARY ELIZABETH THOMPSON,) Case No: 22-20502-drd13
Debtors.)

DEBTORS' MOTION TO EMPLOY COUNSEL

COME NOW Debtors and move the Court to approve the employment of Counsel for their pending appeal of a state court judgment. In support thereof, Debtors state as follows:

1. Debtors' petition in Chapter 13 was filed on 12/07/2022, and has not yet been confirmed..
2. On 04/03/2023, Mary Thompson was involved in an automobile accident in which she believes the other driver was at fault, and in which she sustained moderate injuries and severe damage to her automobile.
3. Ms. Thompson has engaged Blake Markus of Carson & Coil, PC of Jefferson City, Missouri to represent them in their insurance claim. A copy of the retainer agreement between Carson and Coil and Mrs. Thompson is attached hereto and marked as Exhibit 1. A verified statement from Mr. Markus describing his connection to the Debtors and indicating that he is a disinterested party is attached hereto and marked as Exhibit 2.
4. Mr. Markus is experienced in matters of this character and is well qualified to perform the professional services necessary in this case, having over a decade of plaintiff's personal injury experience. The Debtors selected Mr. Markus based on the referral of their Chapter 13 counsel. Mr. Markus has no connection to the bankruptcy case other than being a member of the law firm that the Debtors' counsel had been employed by from July 2018 through March of 2020, and having represented Mr. Thompson in a different auto accident claim in 2020.
5. Compensation for Mr. Markus is on a contingency arrangement pursuant to Exhibit 1. Debtors have made no retainer or up-front payment of any kind.
6. To the best of applicant's knowledge attorney Markus has no connection with the Debtors (other than that already identified herein), any of the creditors, or any other party of interest in this case, any of their respective attorneys or accountants, and is a disinterested person as that term is defined in 11 U.S.C. § 101(14).

WHEREFORE, Debtor Mary Thompson prays for an order of the Court approving employment of Blake Markus as her attorney for her pending motor vehicle accident claim.

Respectfully submitted,

Date: 05/30/2023

/s/ Alan M. Meyer

Alan M. Meyer, #61954
Meyer and Long, LLP
201 W Broadway Ste #2B
Columbia, MO 65203
(573) 442-8123/ameyer@mmbkc.com
ATTORNEY FOR DEBTORS

NOTICE OF MOTION

Any response to the motion must be filed with 21 days of the date of this notice, pursuant to Local rule 9013-1C, with the Clerk of the United States Bankruptcy Court. Parties represented by an attorney shall file electronically at <https://ecf.mowb.uscourts.gov>. Pro se parties shall mail filings to: United States Bankruptcy Court, Western District of Missouri, 400 East 9th Street, Room 1510, Kansas City, MO 64106. Pursuant to 9013-1D, responses shall address the merits of the motion and, if applicable, set out actions to remedy the particular problem. The Court will serve such response electronically on the Trustee, debtor's attorney and all other parties to the case who have registered for electronic filing. Respondent shall serve all parties who are not served electronically.

If a response is timely filed, a hearing will be held on a date and time determined by the Court. Notice of such hearing will be provided to all parties in interest. If no response is filed within 21 days, the Court will enter an order.

For information about electronic filing go to www.mow.uscourts.gov or call the Court's HELP line at 1-800-466-9302.

CERTIFICATE OF SERVICE

THE UNDERSIGNED certifies that a true and correct copy of the foregoing was served on all parties in interest requesting notice on, via the Court's ECF system, and by US Mail, postage prepaid, upon all creditors at the address maintained on the Court's most recent matrix, and on the following:

Office of the United States Trustee
400 East 9th Street, Room 3440
Kansas City, MO 64106

/s/ Alan M. Meyer
